

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
CINCINNATI

MARTIN WOODALL,

Case No.: 1:20-cv-729

Plaintiff,

v.

AMERICAN ELECTRIC POWER
COMPANY, INC.,

Defendant.

COMPLAINT

NOW COMES Plaintiff, by and through counsel undersigned, O'BRYAN BAUN KARAMANIAN, complaining against Defendant as follows:

1. Jurisdiction and venue lie in this action, Defendant conducting business within this forum's boundaries.
2. Jurisdiction is founded under the Jones Act (46 USCA 30104) for negligence, and under the General Maritime Law for unseaworthiness, maintenance and cure.
3. At all times material to issues herein Plaintiff served as an employee of Defendant serving as a crewmember aboard its vessels, with all acts and/or omissions giving rise to this action occurring in the course of Plaintiff's employment in the service of his ship.
4. On or about August 1 or 2, 2019, Plaintiff was ordered to handle certain 80lb. plus wires on a barge by himself when because of said failure to provide a safe place to work, inadequate assignment of crewmembers, and the unseaworthiness of the vessel, i.e., insufficiently manned and handling too heavy of a load alone, he was injured.

5. Defendant's tortious acts aforesaid caused or contributed to Plaintiff's damages, *inter alia*, as follows:

- a. Pain and suffering, past future;
- b. Mortification, humiliation, fright shock and embarrassment;
- c. Loss of earnings and earning capacity;
- d. Hospital, pharmaceutical and other cure expenses;
- e. Aggravation of prior condition, if any there be;
- f. Inability to engage in social, recreational, and other pursuits previously enjoyed;
- g. Mental anguish;
- h. Foun;
- i. Maintenance, cure, and/or attorney fees.

WHEREFORE, Plaintiff demands trial by jury and judgment against Defendant, together with interest, costs, attorney fees and expenses, all to be methodically adjusted upwards during the pendency of this cause.

O'BRYAN BAUN KARAMANIAN

/s/ Kirk E. Karamanian

KIRK E. KARAMANIAN (P52955)

Attorneys for Plaintiff

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_____ /

DEMAND FOR TRIAL BY JURY

NOW COMES Plaintiff by and through counsel undersigned, O'BRYAN BAUN
KARAMANIAN, and hereby demands trial by jury in the above-referenced cause of action.

O'BRYAN BAUN KARAMANIAN

/s/ Kirk E. Karamanian

KIRK E. KARAMANIAN (P52955)

Attorneys for Plaintiff

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